

Examination of the Basingstoke and Dean Local Plan

Exploratory meeting 10th December 2014

Cllr David George speaking on behalf of Whitchurch Town Council.

Topic 3 Housing Issues

Whitchurch Town Council has supported its Community in the preparation of their Neighbourhood Plan since it commenced in March 2013. The plan is nearing completion and is programmed to be submitted for examination early in the New Year. The planning process has involved comprehensive assessment of needs and site selection for both housing and employment use. The preparation has involved extensive consultation with the community and landowners and developers who wish to have sites considered for development.

The Town Council fully endorsed the decision of the Community to submit their plan ahead of the formal adoption of the Local Plan. This decision was based primarily on the potential for opportunistic planning applications exploiting the lack of a Local Plan and 5 year housing land supply.

The Whitchurch Neighbourhood Plan has been prepared in full compliance with the BDBC Submitted Local Plan which requires 350 homes to be built over the plan period includes policies which delegate the responsibility of allocating sites for 200 of the homes to the Neighbourhood Plan a policy which Whitchurch Town Council full supports and conforms to the spirit of the NPPF and the Localism Act 2011.

The consultation process has shown that despite significant infrastructure impacts which will adversely affect their quality of life the Community have accepted the planned requirement for housing development as well as identifying the need for additional employment land which was not identified in the Draft Local Plan. They have also identified additional potential sites for housing development beyond those identified in the SHLAA.

The Town Council are concerned that any material change in the number of homes to be built in Whitchurch could undermine the process that has already been completed including the confidence of the Community and the Volunteers who give so much of their time to ensure the Plans prepared reflect the views of the Community. Material changes could also require significant additional efforts to re-run the consultation process with different assumptions and requirements. The resultant delays could also allow developers to exploit the window of opportunity to win planning permission for sites which the Neighbourhood Plans do not favour. This would clearly be against the spirit and intentions of the NPPF and the Localism Act 2011.

Under policy SS5 sites for 150 of the 350 homes has already been allocated any change would have a disproportional affect upon the remaining 200 houses to be allocated in the Neighbourhood Plan. The Town Council would strongly recommend that full consultations are held with the Whitchurch Neighbourhood Plan Steering Committee and indeed other Neighbourhood Plans in the Borough to benefit from the assessments they have made and take into account the constraints and

opportunities they have identified before any decisions are made in relation to changes in housing numbers or any other material matter.

Topic 4 Environment

Whitchurch Town Council is concerned that the River Test a SSSI and one of its most important assets will be adversely impacted and degraded as a result of the developments proposed in the Local Plan. According to a recent SSSI assessment the River Test has been classified as “unfavourable and declining in condition” (*River Test Unit SSSI Water Level Management Plan - Overarching report 2006* and the *Test and Itchen River Restoration Strategy - Technical Report 2012*)

There is no detailed assessment of the quality of the River Test to a standard which would enable tipping points for changes in standards to be assessed.

In 2010 Southern Water planned to upgrade the sewage treatment works at Whitchurch to include methanol treatment to remove Nitrates and protect the River Test against further degradation. (*Whitchurch Waste Treatment Works - BDB/73444, 2010 - Methanol Plant*) Clearly given the level of investment required the case for such requirement was established.

In 2012 the upgrading was cancelled and larger soakaways to recharge effluent including the Nitrate and Phosphate contaminants into the Chalk Aquifer were planned instead. (*Whitchurch Waste Treatment Works - BDB/77428, 2010 - No Methanol*). Whilst there are some largely unsubstantiated claims that it would be a more appropriate solution the reasons for this cancellation appear to be primarily financial.

The above assessments do not include an assessment of the additional loadings from the housing which is proposed under the Local Plan

The River Test is a Chalk river with the flow being derived from the chalk groundwater. Long term introduction of nitrates into the Chalk Aquifer are contrary to the Water Quality Framework. Nitrates are known to degrade only very slowly in unconfined chalk aquifer (www.gov.uk/government/uploads/system/uploads/attachment_data/file/291473/scho0605bjcs-e-e.pdf) and represent a source of contamination which result in the long term harm to the quality of water and habitats of the Test and its associated SSSI.

The BDBC responses to the inspectors report there includes no clear process or program by which the potential impacts of the sewage discharges and tipping points will be assessed or which methods of mitigation are required and when money may be available to implement these.

Whitchurch Town Council have no confidence that the current proposals are adequate to protect the River Test against significant degradation (indeed the current proposals would appear to result in long term harm) or that these issues have been adequately addressed in the Submitted Local Plan.